

March 18, 2001

Docket No. 00N-1396 & Docket No. 00D-1598  
FDA Commissioner, Dockets Management Branch (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane, Room 1061  
Rockville, MD 20852

0987 '01 APR -4 AIO :47

Dear FDA Commissioner

All genetically engineered foods (GEFs) should be subjected to mandatory safety testing, labeling, pre-market environmental review, and full disclosure. The hallmark of regulatory oversight should always be the health and safety of the citizen.

Genetic engineering involves manipulations of genes between different species and allows scientists to bypass the natural barriers which protect the genetic integrity of species. There is strong scientific evidence that foods containing or produced from genetic engineering can cause allergic responses, be toxic, have lowered nutritional value and/or compromise immune responses in consumers. It has been shown that genetically engineered crops can have unpredictable, irreversible changes to the natural environment.

FDA's proposal for companies to merely voluntary consult with FDA concerning the safety of their foods is inadequate. FDA must require mandatory pre-market safety testing.

FDA's proposed rule that environmental review procedures be exempt under the National Environmental Policy Act does not protect the environment. FDA must require mandatory pre-market environmental review.

FDA's proposed rule to allow all labeling of GEFs to be voluntary does not protect my right-to-know. The proposed rule does not allow me the choice to protect my family and the environment. Voluntary labeling unfairly reverses the financial burden onto producers who do not use GEFs. Mandatory labeling is essential for the traceability of GEF products throughout the food supply. Mandatory labeling also protects overseas markets for farmers. FDA must require mandatory labeling of GEFs.

FDA's proposed rule is unlikely to provide the public with adequate information on GEFs for independent review. FDA notes that producers of GEFs may claim that any such information, including the premarket notification, is a trade secret or confidential business information subject to exemption from public disclosure requirements. FDA must require full disclosure.

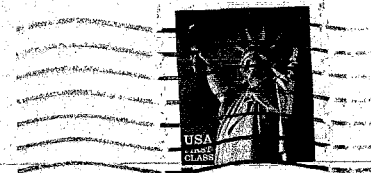
*Thanks for your consideration*  
*Carol J. Merrick*

00N-1396

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